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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re CONNETICS SECURITIES
LITIGATION

Case No. C 07-02940 SI

**STIPULATION AND [PROPOSED]
ORDER REGARDING BRIEFING
SCHEDULE**

This Stipulation is entered into by and among lead plaintiff Teachers' Retirement System of Oklahoma ("Plaintiff") and defendants Connetics Corp. ("Connetics"), Thomas G. Wiggans, C. Gregory Vontz, John Higgins, Lincoln Krochmal, Eugene A. Bauer, R. Andrew Eckert, Carl B. Felbaum, Denise M. Gilbert, John C. Kane, Thomas D. Kiley, Leon E. Panetta, G. Kirk Raab, and Alexander J. Yaroshinsky ("Defendants").

WHEREAS, on June 6, 2007, this consolidated action was transferred from the Southern District of New York to the Northern District of California;

WHEREAS, Plaintiff intends to file an amended consolidated complaint;

1 WHEREAS, Defendants intend to move to dismiss the amended consolidated complaint
2 for failure to state a claim; and

3 WHEREAS, the parties believe that the resources of the Court and the parties are best
4 conserved, and the interests of judicial economy are best served, by stipulating to a schedule for
5 Plaintiff's amended consolidated complaint and Defendants' motion to dismiss;

6 IT IS HEREBY STIPULATED AND AGREED, pursuant to Northern District of
7 California Civil Local Rule 6-1, by and between the undersigned counsel for the parties, as
8 follows:

9 1. Plaintiff will file and serve an amended consolidated complaint on or before June
10 28, 2007.

11 2. Defendants will file and serve their respective motions to dismiss the amended
12 consolidated complaint for failure to state a claim on or before August 6, 2007.

13 3. Plaintiff will file and serve its opposition to Defendants' motions to dismiss on or
14 before September 10, 2007.

15 4. Defendants will file and serve their respective replies in support of their motions to
16 dismiss the amended consolidated complaint on or before September 27, 2007.

17 5. The parties request that the Court schedule a hearing on Defendants' motions to
18 dismiss on the earliest available date.

19 IT IS FURTHER STIPULATED, pursuant to Northern District of California Civil Local
20 Rule 6-1, by and between the undersigned counsel for the parties, that the parties may enter into
21 and submit a further appropriate stipulation amending this filing.

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1 Respectfully submitted,
2 Dated: June 21, 2007 FENWICK & WEST LLP

3
4 By: _____/s/
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13 R. Andrew Eckert, Carl B. Felbaum, Denise
14 M. Gilbert, John C. Kane, Thomas D. Kiley,
15 Leon E. Panetta, G. Kirk Raab

16 Dated: June 21, 2007 DLA PIPER US LLP

17 By: _____/s/
18 Alysson Russell Snow

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21 Telephone: (619) 699-2858
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23 Attorneys for Defendant Alexander J.
24 Yaroshinsky

25 Dated: June 21, 2007 BERNSTEIN LITOWITZ BERGER &
26 GROSSMANN LLP

27 By: _____/s/
28 David R. Stickney

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Attorneys for Plaintiff Teachers' Retirement
System of Oklahoma and Court Appointed
Lead Counsel for the Class

1 Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, I attest
2 under penalty of perjury that concurrence in the filing of the document has been obtained from
3 Alysson Russell Snow and David R. Stickney.

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5 **PURSUANT TO THE STIPULATION, IT IS SO ORDERED.**

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7 DATED: _____ 2007

THE HONORABLE SUSAN ILLSTON
UNITED STATES DISTRICT JUDGE

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FENWICK & WEST LLP
ATTORNEYS AT LAW
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